



IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

ROSE WOODS,

Plaintiff,

vs.

ROSS DRESS FOR LESS, INC.,
a foreign corporation and MEGAN
BUTLER, an individual

Defendant.

DISTRICT COURT
FILED

MAY 23 2018

DON NEWBERRY, Court Clerk
STATE OF OKLA. TULSA COUNTY

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Case No.:

Judge:

Attorney Lien Claimed

CJ-2018-02181

PETITION FOR NEGLIGENCE

DAMAN CANTRELL

The Plaintiff, ROSE WOODS, herein alleges and states the following
against the Defendants, ROSS DRESS FOR LESS, INC. (herein after referred to as Ross)
and MEGAN BUTLER:

1. Plaintiff is a resident of Rogers County, State of Oklahoma;
2. Defendant, ROSS DRESS FOR LESS, INC., is a foreign corporation which owns, operates, and maintains a retail store in Broken Arrow, Tulsa County, Oklahoma.
3. Defendant, MEGAN BUTLER, was the store manager of the Ross Dress for Less retail facility located at 1532 E. Hillside Dr., Broken Arrow, Oklahoma on the date of the incident in question.
4. The incident complained of herein occurred in Tulsa County, State of Oklahoma;
5. This Court has personal and subject matter jurisdiction over the parties and issues contained in this lawsuit;

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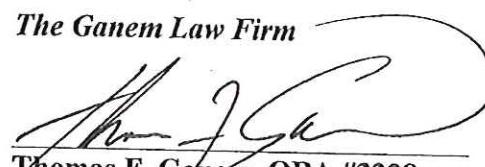
6. On October 21, 2017, Plaintiff was entering the premises as a business invitee when a "for hire" sign placed in the outdoor walkway by Ross caused her to fall resulting in serious and permanent injuries.
7. Defendants knew or should have known that the sign was improperly placed making it hazardous to the public, including the Plaintiff.
8. Defendants failed to warn Plaintiff that the sign was not properly secured.
9. Defendants knew or should have known that by placing the sign in its location that it was foreseeable that Plaintiff and others could be harmed.
10. Defendant Ross, through it's employees, failed or refused to maintain the premises in a safe condition necessary to protect the public and invitees, such as Plaintiff.
11. The actions or inactions of the Defendants were in reckless disregard for the safety of others, including Plaintiff, warranting an award of punitive damages against the Defendants.
12. As a result of the negligence of the Defendant, the Plaintiff sustained personal injuries for which she is entitled to damages against these Defendants for said injuries, medical expenses, pain and suffering (past, present and future), emotional trauma (past, present and future), loss of certain physical abilities, economic losses; disfigurement, loss of enjoyment of life, and any permanent disability resulting therefrom. Plaintiff is entitled to damages against the Defendant in an amount in excess of Seventy Five Thousand Dollars (\$75,000.00).

13. As a result of Defendant's reckless disregard for safety and/or intentional acts or inaction Plaintiff is entitled to punitive damages against the Defendant in an amount in excess of Seventy Five Thousand Dollars (\$75,000.00).

WHEREFORE, premises considered, the Plaintiff, Rose Woods, prays for judgment against the Defendants for physical injuries, medical expenses, pain and suffering, emotional trauma, loss of certain physical abilities, economic losses, disfigurement, loss of enjoyment of life, and any permanent disability resulting therefrom and attorney fees and costs in an amount in excess of Seventy Five Thousand Dollars (\$75,000.00). Furthermore, Plaintiff prays for punitive damages and other relief this Court deems just and proper, all in an amount in excess of Seventy Five Thousand Dollars (\$75,000.00).

Respectfully submitted,

The Ganem Law Firm



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